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Ronald J. Thompson
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June 25, 2008

Mr. John Schofield
RCRA Enforcement Office
U.S. Environmental Protection Agency
Mail Code: WST-3
75 Hawthorne St.
San Francisco, CA 94105
schofield.john@epa.gov

< By Email >

Dear Mr. Schofield:

This letter is a follow-up to your inspection of our facility in Riverside on May 20, 2008. We want to bring you up-to-date on our efforts to address the issues identified during your site visit. Goodrich is committed to sound environmental management and to continuous improvement of our performance. Since your inspection, the following corrective actions have been taken:

Accumulation Area Management

Attached are copies of manifests showing disposal of all materials that had been stored on site in accumulation areas for over 90 days. These materials were removed from the plant on May 21st. We have been investigating why the 90 day rule was not being observed by Rineco Chemical Services, the vendor Goodrich retained to provide onsite management of hazardous wastes. At least in part, this appears to have been caused by Rineco's misunderstanding of the difference between the "one year" period allowed by California regulations for satellite accumulation and the 90-day period allowed once a container is moved from a satellite to a storage area.

Many of the containers moved by Rineco from satellite accumulation to 90-day storage were not properly relabeled with the "90-day accumulation date." At least three containers where the date on the container apparently exceeded 90 days had actually been in storage for substantially less than that period, e.g., the date listed on the container showing that the drum had been stored for over 90 days was incorrect. Where we found that materials were, in fact, stored in an accumulation area past 90 days, we immediately prepared a manifest and sent them offsite for proper disposal.

Goodrich has revised the weekly checklist and the daily accumulation inventory sheet to make a more clear distinction between the two types of accumulation (satellite versus 90-day) and to describe the actions that must be taken when containers approach various critical dates. The new inspection checklist (copy attached) addresses three other issues identified during your visit: acceptable levels of damage to containers, storage of incompatible materials within close proximity, and adequate aisle space. Rineco has also retrained their personnel to ensure that they fully understand the regulations on satellite and 90 day storage.

Training Plan

During the visit, you commented that documentation of the hazardous waste training plan and program was not as thorough as you would desire. We have prepared a revised training plan (including more explicit job descriptions), a copy of which is attached. We would appreciate any comments you might have on the revised plan, particularly in its clarity to an outside inspector.

Satellite Accumulation

During the visit you asked whether our method of satellite storage fully conforms to regulatory requirements while also commenting on its apparent effectiveness. We have started the process of re-examining satellite accumulation of wastes at the plant. We are looking at alternatives that retain the effectiveness of the existing system while tightening up controls to ensure that we do not exceed any regulatory thresholds. Last week, we held the first of a series of Six Sigma Kaizen events on this topic. We will either work out a way to improve the current satellite accumulation structure or implement a replacement process.

Pre-Preg Waste Treatment

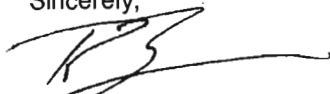
You asked questions about our program, approved by the local Certified Unified Planning Agency (CUPA), for onsite treatment of the pre-preg waste through autoclaving. To that end, we have gone back to look at this waste and our treatment process from "first principles". Specifically, we are evaluating whether this material is a hazardous waste under either federal or state definitions and, if so, its eligibility for onsite treatment. We expect to have those results in a few weeks. Depending on the outcome of our review, we may want to request your assistance in interpreting how the regulations apply in this case. We would like to include the CUPA in those discussions to ensure that all parties agree on how this waste should be handled.

Onsite Waste Vendor

Goodrich has employed an onsite waste manager, Rineco Chemical Services, to handle the day-to-day movement of wastes and management of the main accumulation area. We recognize that while we may delegate the task of doing this work to an outside vendor, we cannot delegate the responsibility and accountability for legal compliance. To that end, we have met with Rineco management and have urged them to conduct their own root cause analysis of these issues. Further, we have increased our level of oversight over their program, including a regular review of their accumulation area and of the weekly inspections.

We hope this information is helpful to you. Goodrich is committed to compliance with all environmental, health and safety regulations. We have used your inspection and observations to catalyze a re-examination of our hazardous waste management program. The outcome will be an improved program with stronger management controls. We look forward to receiving your report so that we can address any other issues not covered in our initial follow-up.

Sincerely,



Ron Thompson
Manager, EH&S
Aerostructures Group

Enclosure:

1. Hazardous Waste Manifests
2. Inspection Checklist
3. Hazardous Waste Training Plan

Ref. No. 08-016

8 June 2009

Rohr, Inc.

Goodrich

Merged in 1998

Subsidiary
dBA Goodrich Aerostructures Group

(Esq) Zachary Allen
Ron Thompson

(Esq) Karen Harli

Issue clear after inspection and dealt with promptly
Everything addressed

Prep work was most surprising

— will go to facility that handles HW, but will
go as non-HW

Need to close loop w/ state on permit
Autoclave not financially smart

[Paul Mitchell]

Self-Close on lab waste containers

SEP may not be the best circumstances right now

Goodrich implementing performance based EMS across bld.

Rinco - wanted ~~an~~ an out

DTSC + Cal only waste outstanding